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Attorneys for Plaintiff-Intervenor

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

07-CV-7760 (DC)(FM)
ECF Case

**INITIAL DISCLOSURES
OF PLAINTIFF-INTERVENOR**

- against -

TOURO COLLEGE

Defendant.

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IRENA NACO,

Plaintiff-Intervenor,

- against -

**TOURO COLLEGE and
STANLEY L. KANTOR,**

Defendants.

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Plaintiff-Intervenor, Irena Naco, by her attorneys, Filippatos PLLC, provides the following Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). These disclosures are complete as of this date. Plaintiff-Intervenor reserves the right to modify

and/or supplement these disclosures if she becomes aware of additional information or documents that are subject to disclosure. Additionally, documents prepared by or for counsel, or other documents subject to the protection of a privilege or doctrine, are not included.

(A) Pursuant to Rule 26(a)(1)(A), the name and, if known, the address and telephone number of each individual likely to have discoverable information that Plaintiff-Intervenor may use to support her claims or defenses, unless solely for impeachment. The designation of a witness shall not be construed as authorization for Defendants to contact any such individual:

Robert Babsky
Kenneth Bigel
Mathew Bolin
Irene Cimato
Adriana Jimenez
Rosie Kahan
Stanley Kantor
Akiva Kobre
Brian McDonell
Susan Moskwitz
Refat Ologu
Laura Rusakova
Carly Schwartz
Kara Solomon
Alan Walkowitz
Hal Wicke
Christopher Wilson

For all whom, the last known contact information has already been provided to Defendants by the Equal Employment Opportunity Commission ("EEOC").

(B) Pursuant to Rule 26(a)(1)(B), a copy of, or description by category and location of, all documents, data compilations, or tangible things in the possession, custody, or control of Plaintiff-Intervenor that she may use to support her claims, unless solely for impeachment:

- Employment-related correspondence and documents, including employee benefits and compensation reports;
- Medical records; and
- EEOC files.

All of the foregoing documents are located either in the residence of Plaintiff-Intervenor or the offices of her doctors or legal representative.

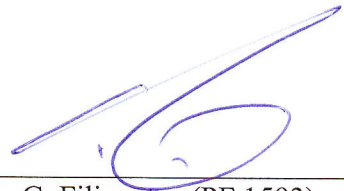
- (C) Pursuant to Rule 26(a)(1)(C), computation of any category of damages claimed by Plaintiff-Intervenor, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosures, on which such computation is based, including materials bearing on the nature and extent of injuries he has suffered:**

Plaintiff-Intervenor seeks backpay (with interest), frontpay differential, and lost benefits from all defendants. Plaintiff-Intervenor also seeks compensatory and punitive damages from all defendants. At this time, Plaintiff-Intervenor has not yet marshaled all of the information necessary to determine the exact amount of monetary damages she will be seeking at trial. Nevertheless, preliminary information has already been disclosed by the EEOC to defendants (see EE00137-EE00152). Plaintiff-Intervenor will supplement this response pursuant to Rule 26(e) as more precise and complete information becomes available.

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action or to indemnify for payment made to satisfy the judgment:**

- Not applicable.

Dated: New York, New York
April 15, 2008



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